

**IN THE UNITED STATES DISTRICT COURT FOR THE NORTHERN
DISTRICT OF TEXAS - FORT WORTH DIVISION**

THE NAUGHTYS, LLC.

Plaintiff,

v.

DOES 1-580,

Defendants.

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Case No. 4:21-cv-00492

DEFENDANTS' REPLY I.S.O.
MOTION TO MOTION FOR EXTENSION OF TIME

COME NOW the Shan Defendants¹ ("Defendants"), to reply to Plaintiff's Response (ECF No. 103) for the limited purposes of: 1) agreeing to the Plaintiff's alternative four-week extension to serve its complaint, and to 2) ask the Court to take notice of the Motion to Dissolve filed by Shan Defendants (ECF No. 104).

Clarifying, the Shan Defendants are unopposed to allowing Plaintiff any reasonable extension to serve all defendants.

¹ Following this Court's identification in [Dkt. 81]: 560 yingli520, 561 yangsuiqwe, 575 aishengheji, 576 LiusaIuy, 532 Bakheng, 526 bismarck, 533 adriaticgo, 538 ashur80, 527 montgomery, 302 Shimigy, 220 COL beans, 232 milkcha, 342 PIKAqiu33, 256 cocounut, 285 Ikevan, 333 SurgicaL, 201 Clearance&100%quality,NyaKLI, 225 Fhci-HR, 355 who-canside 🍪 90% Discount Fast Delivery🍪, 313 much MUCHYOU 🌟 90% Discount Cyber Monday🌟Direct, 226 Vdaye, 218 GJK-SION, 348 OFMWBN, 244 douk-Quite, 238 Chenjbo (Halloween clearance&Christm as clearance), 221 Mariee, 189 Shan-s, 206 Debouor, 249 S5E5X, 250 xatos, 307 TBKOMH (👑2021 Golden Moment: Up to 80% off👑), 335 ZEFOTIM Big Promotion!!!, 367 GREFER, 412 easyshopping66, 391 AtlantaMart2005, 511 xxzfalcon849, 411 e1xytrep, 402 CincinatiStore, 423 globalfashion2010, 505 wishmart2014, 396 bodhi1998, 433 hongyinlon0, 413 eridu905, 390 Atlanta1816, 414 eriophoroidesxx, 474 rockfoilcrabbh, 486 SZbhkei12, 516 yupaxxs, 460 Nannouth, 443 KansasDeal, 426 GreatSpringfield, 501 watch_deal, 422 gilroy2012, 434 hotdeal320, 515 yishengmall2014, 395 bigbigshow2012, 406 Denver0806, 437 hutrsate51, 466 ppktjfa8612, 228 CO CO-US, 248 YHCWJZP, and 301 Hilyo.

Shan Defendants' Motion to Dissolve was a substantive filing that is also time sensitive and needed to be filed as soon as possible.

Shan Defendants were using the legal resources to draft and compile the Motion to Dissolve that would otherwise have been available to draft and file the response for which an extended time is sought.

The Shan Defendants were hopeful that the drafting would be complete with time remaining to file a timely response to the Plaintiff's jurisdictional supplement, but as the Court can see by a casual view of that motion, it was no trivial task, and prioritizing that pleading should at the least constitute both good cause and warrant a finding of excusable neglect based on time running out while accomplishing a related task in the same case.

Respectfully submitted,

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Pro hac vice pending

CERTIFICATE OF SERVICE - I certify that a copy of the attached document was served upon Plaintiff's counsel via the court's e-file system on June 25, 2021.

/s/ Warren V. Norred
Warren V. Norred